

REMARKS/ARGUMENTS

Applicants submit concurrently herewith an RCE and an Amendment. Applicants do **not** want the Amendment filed February 5, 2007 to be entered. The final office action of September 29, 2006 and Advisory Action mailed February 27, 2007 have been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested. Claims 1-20 remain pending in this application. Independent claims 1 and 8 have been amended herein.

Informal Interview Summary

Applicants' representatives would like to express their appreciation for the time taken by the Examiner to discuss the pending claims in an informal telephone interview on March 21, 2007 and the above amendment. The discussion below conveys the substance of what was discussed.

Claim Rejections - 35 U.S.C. § 102(e)

Claims 1-14 and 17-20 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. patent no. 6,606,707 to Hirota et al. ("Hirota"). Applicants respectfully traverse this rejection.

Hirota relates to a conventional memory card, which receives data and an address corresponding to the data from the host (e.g. PC). However, the memory card does not receive information indicating the correspondence between the data and files such as, which part of which file the data belongs to. Instead, the host performs management of correspondence between data and files, i.e., file management.

As discussed during the informal interview, Hirota fails to teach or suggest a *non-volatile semiconductor memory package* or a *detachable memory device including a file management portion* connected to the network interface and configured to *independently manage* a relationship between a data file from the network and an address of the memory cell array as recited in independent claims 1 and 8, respectively. In contrast, Hirota discloses that the management commands are generated by the PC 102 (host). As such, in Hirota at least part, if not all, of the management function is performed by the PC. For at least this reasons, independent claims 1 and 8 are patentably distinct from Hirota.

Claim Rejections - 35 U.S.C. § 103(a)

Claims 15 and 16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Hirota in view of U.S. patent no. 5,751,631 to Liu et al. ("Liu"). Applicants respectfully traverse this rejection.

Claims 15 and 16, which respectively depend from claims 1 and 8, were rejected over the combination of Hirota and Liu. Notwithstanding the propriety of the combination, Liu fails to remedy the defects of Hirota noted above. Namely, Liu lacks a teaching or suggestion of a file management portion as claimed. For at least this reason, the combination of Hirota and Liu, even assuming proper, does not result in the claim 15 and 16 inventions.

CONCLUSION

If any additional fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicit prompt notification of the same.

Respectfully submitted,
BANNER & WITCOFF, LTD.

Dated: March 26, 2007

By: /Gary D. Fedorochko/
Gary D. Fedorochko
Registration No. 35,509

1100 13th Street, N.W., Suite 1200
Washington, D.C. 20005-4051
Tel: (202) 824-3000
Fax: (202) 824-3001
GDF:lab